

21st May 2014

Commanding Officer
U.S. Coast Guard Marine Safety Center
2100 2nd St. SW, Stop 7102
Washington, DC 20593-7102

RE: Application for Acceptance of the Wärtsilä AQUARIUS® EC Ballast Water Management System as an Alternate Management System

Dear Sir,

In accordance with the regulations at 33 CFR 151.2026 and 46 CFR 161.060-12 and the policy promulgated in CG-OES Policy Letter 12-01, we are submitting an application for Acceptance as an Alternate Management System and for Use and Acceptance of existing test data. Wärtsilä received Administration Type Approval from the Minister of Infrastructure and The Environment (ILenT) of The Netherlands on 11 December 2013 for AQUARIUS® EC BWMS models AQ-250-EC to AQ-3300-EC (corresponding to the Total Rated Capacity in m³/hr for each model). Lloyd's Register were contracted by ILenT to evaluate all aspects of the type approval dossier including the design, materials and construction for shipboard use in accordance to the requirements of MEPC.174(58).

As a result, Wärtsilä believes that all criteria for United States Coast Guard (USCG) acceptance as an Alternate Management Systems (AMS) have been met. The Enclosures contain all of the information required by Enclosure (1) to CG-OES Policy Letter 12-01 including the completed AMS Review Checklist and all required supporting documentation.

Additionally, Wärtsilä believes that, due to the approval by The Netherlands and Lloyd's Register of Shipping, the technical design, engineering and electrical drawings and diagrams, and bills of materials meets or exceeds the design and construction requirements at 46 CFR 162.060-20. Therefore, these data are submitted in accordance with 46 CFR 161.060-12 for use and acceptance of existing test data for the purposes of review by the Marine Safety Center (MSC). After we further review the additional documentation and testing requirements contained in 162.060 and consult with the Coast Guard accepted Independent Lab(s), we anticipate an additional submission of data in accordance with 162.060-12.

Land-based testing for the AQUARIUS® EC BWMS was tested in full compliance with the G8 Guidelines and in substantial compliance with the EPA ETV protocols at brackish and marine salinities at the NIOZ test facility in the Netherlands. The AQUARIUS® EC BWMS was then tested on board the M/V ANVIL POINT.

This dossier was completed with the assistance of Gary Croot (IMESA, Inc.) and Jon Stewart (IMTCI) in the United States. We authorize both Mr. Croot and Mr. Stewart to act on our behalf during the processing and review of this Application for Acceptance as an Alternate Management System. Any questions or clarifications needed during the review process can be directed to them to help expedite this Application. Their contact information is included at the end of this letter.

Respectfully,



Dr. Stelios Kyriacou
Technical Director-Ballast Water Management Systems
Wärtsilä Water Systems Ltd

Enclosures:

1. Letter of Clarification (Hamworthy 2 Wärtsilä)
2. Checklist for Responses to CG-OES Policy Letter 12-01, Encl. (1)
3. Alternate Management System Checklist for Wärtsilä AQUARIUS® EC BWMS
4. Alternate Management System Checklist Supplement for Wärtsilä AQUARIUS® EC BWMS
5. Application for Use and Acceptance of Existing Test data in accordance with 46 CFR 162.060-12
6. Complete AMS Application Package on CD (3 copies)

Gary Croot
President
International Maritime Environmental
and Safety Associates, Inc.
9 Sandy Brook Drive
Durham, NH 03824
603-397-5126 (work)
603-397-9361 (mobile)
gtcroot@imesacorp.com

Jon Stewart
President
International Maritime
Technology Consultants, Inc.
2026 NE 32 Avenue
Fort Lauderdale, FL 33305
954-565-4044 (work)
954-907-7625 (mobile)
954-565-1008 (fax)
maritimeadvisor@hotmail.com